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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF LINDSAY COOPER
IN SUPPORT OF PLAINTIFF WAYMO
LLC'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL ITS MOTION TO
COMPEL FURTHER 30(B)(6)
TESTIMONY FROM UBER**

1 I, Lindsay Cooper, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo's Administrative Motion to File Under
7 Seal confidential information in its Motion to Compel Further 30(b)(6) Testimony from Uber
8 ("Waymo's Administrative Motion"). Waymo's Administrative Motion seeks an order sealing the
9 following materials:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo's Motion to Compel Further 30(b)(6) Testimony from Uber ('Waymo's Motion')	Highlighted in Blue	Defendants
Exhibit B to Waymo's Motion	Entire Document	Defendants
Exhibit C to Waymo's Motion	Highlighted in Blue	Defendants

15 3. Waymo's Motion and exhibits contain information that Defendants have designated as
16 confidential and/or highly confidential.

17 4. Waymo takes no position on the merits of sealing the designated material, and expects
18 Defendants to file one or more declarations in accordance with the Local Rules.

19 I declare under penalty of perjury under the laws of the State of California that the foregoing is
20 true and correct, and that this declaration was executed in San Francisco, California, on August 24,
21 2017.

22 By /s/ Lindsay Cooper

23 Lindsay Cooper
24 Attorneys for WAYMO LLC
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SIGNATURE ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from Lindsay Cooper.

/s/ Charles K. Verhoeven
Charles K. Verhoeven